



U.S. Department of Energy
**National Transportation
Program**
The Focal Point of All DOE Transportation

Transportation Compliance Evaluation Assistance Program (TCEAP)

Fiscal Year 2000 Annual Report

December 2000

Approved:

Steve Hamp
Acting Director
National Transportation Program
Albuquerque

TABLE OF CONTENTS

EXECUTIVE SUMMARY	1
Hazardous and Radioactive Materials Packaging	1
Motor Carrier Operations	1
Transportation Emergency Response	2
Hazardous Materials (HAZMAT) Employee Training	2
1.0 INTRODUCTION	3
2.0 BACKGROUND	3
3.0 TCEAP PROCESS	4
3.1 Evaluation Objectives and Standard Operating Procedures	4
3.2 Performance Objectives	5
3.3 FY 2000 Enhancements to the TCEAP Process	6
Management Plan	6
Standard Operating Procedures	7
Checklists	7
4.0 SUMMARY OF RESULTS	8
5.0 LESSONS LEARNED	9
5.1 M&O/M&I Contractor Responsibilities	9
5.2 OA-30 Review Results	10
5.3 Observations	11
Hazardous and Radioactive Materials Packaging	11
Motor Carrier Operations	11
Transportation Emergency Response	11
HAZMAT Employee Training	12
6.0 CONCLUSION	12

Transportation Compliance Evaluation Assistance Program Fiscal Year 2000 Annual Report

EXECUTIVE SUMMARY

The U.S. Department of Energy's (DOE) National Transportation Program-Albuquerque (NTP-A) and DOE Field Offices are responsible for ensuring DOE's transportation and packaging operations fully comply with all applicable international, federal, state, Tribal, and local laws, rules, and regulations, and with DOE Orders and policy. To meet this responsibility, the NTP-A Transportation Compliance Evaluation/Assistance Program (TCEAP) has established a systematic approach to evaluating and enhancing DOE compliance with applicable transportation and packaging regulations and requirements. This approach provides a multi-level (DOE Headquarters, Programs, Field Offices, and contractors) management tool for maintaining regulatory compliance, accessing methodologies that will enhance management and operational practices, and addressing stakeholder concerns through effective interaction.

This report presents an overview of the TCEAP evaluations and assistance activities conducted at DOE sites evaluated during fiscal year (FY) 2000. As a result of lessons learned from FY 1999, NTP-A provides quarterly status reports or updates concerning lessons learned (observations and recommendations) from site evaluations to all DOE and contractor transportation personnel. This information also is available via the NTP website (www.ntp.doe.gov).

The six evaluations performed in FY 2000 relied on the performance objectives identified in Section 3.2 of this report (although not all of these performance objectives were utilized in each evaluation). The evaluations yielded a total of 30 observations and 26 general recommendations for systematic improvement. These observations and recommendations are listed the NTP web site (see above paragraph). Those contractors evaluated through the TCEAP process are required to provide corrective action plans to address specific Level 1 through 3 Observations, if any, as well as any other observations or recommendations identified by the TCEAP Team Leader. Four areas received Level 2 Observations during the six FY 2000 evaluations, including:

Hazardous and Radioactive Materials Packaging

- Sample packaging and shipping activities
- Improper maintenance of radioactive packages
- Need to incorporate PAAA requirements

Motor Carrier Operations

- Lack of understanding of Federal Motor Carrier Safety Regulations (FMCSRs) and their application to site operations

- Use of incorrect data by contractors to substantiate applicability of FMCSRs to their operations

Transportation Emergency Response

- Failure of some sites to properly implement the requirements of 49 CFR 172.600 for 24-hour emergency response phone systems
- Inability to immediately provide comprehensive information
- Misunderstanding of the roles and responsibilities of third party service providers and the contractor during the emergency

Hazardous Materials (HAZMAT) Employee Training

- Failure of some sites to establish a system to properly identify HAZMAT employees
- Absence of a means for Management and Integration (M&I) contractors to ensure proper training of subcontractors
- Fragmented recordkeeping corresponding to reductions in training budgets

The observations indicate the possibility of a potentially breakdown in DOE's ability to ensure compliance with federal, state, Tribal, and local laws and regulations as shipping activity increases. Increased shipping activity will become a greater concern in future years as tens of thousands of shipments of hazardous and mixed waste are necessary to meet the goals of DOE's environmental cleanup mission. In addition, as transportation/packaging personnel retire, appropriate training systems must be in place to ensure that incoming personnel have the knowledge and skills needed to continue proper compliance with government regulations and DOE Orders and policy.

In FY 2000, the TCEAP process was reviewed by the Office of Independent Oversight and Performance Assurance (OA-30) at the West Valley Demonstration Project (WVDP) TCEAP. OA-30 reviewed the TCEAP Management Plan, Standard Operating Procedures, and checklists. They also observed evaluators in the field as they reviewed documents, interviewed personnel, and observed the performance of tasks in the field. The TCEAP process received the highest score from OA-30—a "satisfactory" rating with no official findings and only minor recommendations for enhancing the overall process. These recommendations have already been addressed and implemented by the TCEAP.

The TCEAP has proven itself a valuable management tool that provides transportation and packaging expertise to various DOE sites and, as a result, enhances their overall operational efficiencies. NTP-A will continue to re-evaluate the TCEAP to identify potential improvement opportunities and to maintain the DOE Field Offices as primary customers.

Transportation Compliance Evaluation Assistance Program

Fiscal Year 2000 Annual Report

1.0 INTRODUCTION

As identified in U.S. Department of Energy (DOE) Order 460.2, "Departmental Materials Transportation and Packaging Management," the U.S. Department of Energy's (DOE) National Transportation Program-Albuquerque (NTP-A) and DOE Field Offices are responsible for ensuring DOE's transportation and packaging operations fully comply with all applicable international, federal, state, Tribal, and local laws, rules, and regulations, and with DOE Orders and policy. To meet this responsibility, the NTP-A Transportation Compliance Evaluation/Assistance Program (TCEAP) has established a systematic approach to evaluating and enhancing DOE compliance with applicable transportation and packaging regulations and requirements. This approach provides a multi-level (DOE Headquarters, Programs, Field Offices, and contractors) management tool for maintaining regulatory compliance, accessing methodologies that will enhance management and operational practices, and addressing stakeholder concerns through effective interaction.

This report presents an overview of the TCEAP evaluations and assistance activities conducted at DOE sites evaluated during fiscal year (FY) 2000. As a result of lessons learned from FY 1999, NTP-A provides quarterly status reports or updates concerning lessons learned (observations and recommendations) from site evaluations to all DOE and contractor transportation personnel. This information also is available via the NTP website (www.ntp.doe.gov).

2.0 BACKGROUND

Until 1990, companies performing work under contract to government agencies were exempt from compliance with federal regulations because of the sovereign immunity of the agencies themselves. In 1990, the statutory language contained within the Hazardous Materials Transportation Uniform Safety Act (HMTUSA) moved companies performing under government contract out from under the sovereign immunity of government agencies. This legislation defined and ushered in the use of terms such as Government-Owned/Government-Operated (GOGO) and Government-Owned/Contractor-Operated (GOCO). For shipments made "in commerce," GOCO facilities must comply with all applicable regulations contained in the *U.S. Code of Federal Regulations* (CFR), 10 CFR 71, Packaging and Transportation of Radioactive Material; 40 CFR 262-263, Standards Applicable to Generators and Transporters of Hazardous Waste; 49 CFR 170-180, Hazardous Materials Regulations; and 49 CFR 350-399, Federal Motor Carrier Safety Regulations. Some of these shipments, although considered "onsite" by the DOE boundary definition, also meet the U.S. Department of Transportation's (DOT) definition of "in commerce," and, therefore, must comply with applicable federal transportation regulations.

3.0 TCEAP PROCESS

3.1 Evaluation Objectives and Standard Operating Procedures

In addition to verifying compliance with international, federal, state, Tribal, and local regulations and with DOE Orders and policy, the TCEAP process allows senior management to identify problems, prepare and implement corrective actions, identify and build on strengths, more effectively manage DOE transportation activities, and enhance levels of regulatory compliance and safety fitness.

TCEAP evaluation teams are comprised of subject-matter experts (SMEs) who collect information to establish that overall program objectives are being achieved. These evaluation teams also provide technical assistance throughout the evaluation activity by offering recommendations based on recognized transportation and business practices and by identifying additional information and/or training sources. If requested, the SMEs will assist DOE Operations/Field Office or contractor personnel with in-depth root cause analysis, corrective action plan development and implementation, implementation verification, and/or development of statistical monitoring tools to evaluate the effectiveness of the implemented corrective actions. In this way, the TCEAP evaluation teams can assist transportation and packaging personnel in finding the cause(s) behind deficiencies and in fostering the development of management or procedural systems to continually maximize regulatory compliance, increase efficiency, enhance worker safety, and demonstrate continuous improvement.

Training classes are available to contractors that are unfamiliar with the TCEAP process. Through this training, contractors can learn both their responsibilities in the TCEAP process and what to expect from evaluators. Contractors have found that the training reduces employee stress and anxiety levels and encourages a less confrontational atmosphere between the evaluators and the personnel being evaluated. TCEAP process training classes should be provided at least three months before the scheduled evaluation.

Three Standard Operating Procedures (SOPs) have been developed for all essential TCEAP activities. These SOPs function as stand-alone procedures that are specific to process function. A description of each SOP is provided below:

- NTP-A-TCEAP.001 provides information to assist DOE Operations/Field Office staff and individual contractor transportation and packaging personnel at each site in using the TCEAP checklists for self-assessment purposes. Such self-assessments can be valuable tools to help each operational unit identify deficiencies in its level of regulatory compliance, safety fitness, or management systems implementation.

- NTP-A-TCEAP.002 provides information on the scheduling of onsite evaluations by NTP-A and/or responsible DOE Operations/Field Offices to ensure compliance with applicable regulations and requirements that are specific to the contractor's transportation and packaging activities.
- NTP-A-TCEAP.003 provides information about assistance available to DOE Operations/Field Offices and/or contractors to help identify and analyze the root cause(s) of noncompliant activities, develop corrective actions to bring these activities into compliance, provide expertise in implementing corrective actions, and make overall improvements to management systems.

In applying the SOPs listed above, corresponding management strengths and weaknesses are characterized and communicated in a report along with any observations and/or recommendations related to the fundamental management objectives listed in Section 5.0 of the TCEAP Management Plan. Such reports are developed and formatted to be as clear, concise, and useful as possible. [The report format is discussed in Section 4.0 of NTP-A-TCEAP.002 and NTP-A-TCEAP.003.] Issuance of this report ensures that proper requirements and objectives are identified and executed in a timely, effective, and efficient manner

3.2 Performance Objectives

NTP-A has established the following performance objectives to guide TCEAP evaluators:

General Management of Transportation and Packaging Programs: Management must demonstrate that it has developed and implemented a Quality Assurance Plan, a Transportation Safety Document (TSD), and if applicable, a Transportation Plan that includes directives, policies, and procedures to provide effective implementation of applicable international, federal, state, Tribal, and local rules and regulations, and the requirements of DOE Orders and policy affecting transportation management.

Hazardous and Radioactive Materials Packaging: A documented packaging procurement and selection program must be in place, including written policies and procedures (e.g., quality assurance), to identify the steps that should be taken to ensure selection of appropriate packaging for transportation of hazardous or radioactive material. These policies and procedures must comply with all applicable international, federal, state, Tribal, and local rules and regulations, and with DOE Orders and policy.

Hazardous and Radioactive Materials Shipper: Shipping of all classes and divisions of hazardous materials (including radioactive) and wastes must be conducted in a consistent, accountable manner that follows approved procedures and complies with all applicable international, federal, state, Tribal, and local laws, rules, and regulations, and with DOE Orders and policy.

Transportation Management Operations: All Transportation Management Operations must be conducted in a consistent, accountable manner that follows approved procedures and complies with all applicable international, federal, state, Tribal, and local laws, rules, and regulations, and with DOE Orders and policy.

Motor Carrier Operations: All Motor Carrier Operations must be conducted in a consistent, accountable manner that follows approved procedures and complies with all applicable international, federal, state, Tribal, and local laws, rules, and regulations, and with DOE Orders and policy.

Railroad Operations: All DOE-owned or -leased railroad operations and maintenance must be performed in a consistent, accountable manner that follows approved procedures and complies with federal regulations and DOE Orders and policy.

Transportation Emergency Response: Transportation Emergency Response for incidents involving hazardous materials (including radioactive) and waste shipments must be provided in a consistent, accountable manner that follows approved procedures and complies with all applicable international, federal, state, Tribal, and local laws, rules, and regulations, and with DOE Orders and policy.

HAZMAT Employee Training: The HAZMAT employer (as defined in 49 CFR 171.8) must identify those HAZMAT employees (as defined in 49 CFR 171.8) required to have HAZMAT training per 49 CFR 172.700. These personnel must be trained, and appropriate documentation must be provided and maintained in compliance with the requirements of all applicable international and federal regulations governing the training of HAZMAT personnel.

3.3 FY 2000 Enhancements to the TCEAP Process

In conformance with the TCEAP Management Plan, an annual TCEAP review was performed in FY 2000. Meetings with evaluators were held in Oak Ridge, Tennessee, and Richland, Washington, and critique sheets were distributed to all of the participants in the annual TCEAP review process.

As a result of the FY 2000 annual review, the following changes were made to the TCEAP.

Management Plan

- Responsibilities were more clearly defined. Other changes may occur in the next review cycle based on information received during the review of the Field Office Transportation Evaluation Program Management Plan.
- Changes to the performance objectives were more clearly stated.

- The form and format of the final TCEAP report were changed to make the document more concise.

Standard Operating Procedures

NTP-A-TCEAP.001

- The narrative to Section 5.0 of the TCEAP Management Plan was deleted and is now depicted in the process flow diagram (Attachment A) of that document.

NTP-A-TCEAP.002

- The narrative to Section 5.0 of the TCEAP Management Plan was deleted and is now depicted in the process flow diagram (Attachment A) of that document.
- Form 1s and 2s were significantly changed. Form 2s were deleted altogether. Form 1, now called the TCEAP Evaluation Form, was changed to incorporate observations-related information at the end of the form. Changes also were made to the section titles in the "Discussion of Results." Evaluators can now be "free form" in writing their narrative write-ups and do not have to follow a prescribed form and format as before. Recommendations can be made without a formal observation, as in the case of a new Level 6 Observation.
- A Level 6 Observation does not need to be written up at the end of the evaluation form as a form observation. A Level 6 Observation is a recommendation made to enhance a process or procedure where no violations of regulations, policy, or procedures have taken place.

NTP-A-TCEAP.003

- The narrative to Section 5.0 of the TCEAP Management Plan was deleted and is now depicted in the process flow diagram (Attachment A) of that document.

Checklists

All the TCEAP Checklists were modified or revised to be more current with the actual operations being performed and to generate a better result. More specific requirements were identified and incorporated into each checklist. One major change to the checklists was the incorporation of Checklists IIIA and IIIB (Hazardous and Radioactive Materials Shipper) into one checklist. This was done to eliminate the significant redundancies identified in the two previous checklists. Other checklists that were substantially modified include Checklist 1 - General Management of Transportation and Packaging Programs and Checklist 7 - Transportation Emergency Response. Checklist 1 incorporates the requirements for a Quality Assurance Program, as identified in DOE

Order 414.1. Checklist 7 incorporates language that ensures a proper tie-in with DOE Order 151.1.

The last change was conversion of all TCEAP-related documents from WordPerfect to Microsoft Word. A survey (e-mail) sent to DOE Operations and Field Office Traffic Managers confirmed that the word-processing program most used in their offices is Microsoft Word. This change should eliminate administrative problems related to document conversion between the two programs and help reduce the amount of time spent “cleaning up” TCEAP reports before they are issued.

OA-30 Review Recommendations

Only two recommendations were made in the final OA-30 report, both dealing specifically with overall enhancement of the TCEAP evaluation process:

- NTP-A should expedite its plan to utilize its website to post TCEAP evaluation results.
- NTP-A should consider standardizing the transportation accident scenario tabletop exercises used in TCEAP evaluations.

NTP-A is posting the results of all its evaluations on its website, and has developed a standard transportation accident scenario for use in future TCEAP evaluation activities related to the tabletop exercise.

4.0 SUMMARY OF RESULTS

As stated previously, six TCEAP evaluations were performed during FY 2000. These evaluations included both large- and small-sized DOE contractors, and so can be interpreted to fairly represent the entire DOE complex. The TCEAP evaluation teams varied in size from four to eight evaluators, and visits ranged in duration from two to five days. The number of evaluators and the duration of the evaluations was determined by the TCEAP Team Leader using existing information about the contractor’s size (number of personnel), the work being performed, and the number of Performance Objectives to be evaluated. The TCEAP Team Leader had the option of selecting as many performance objectives as deemed necessary for a particular contractor.

Priority-level observations made during the FY 2000 TCEAP activities are listed under the appropriate Performance Objective below.

FY 2000 OBSERVATION SUMMARY							
Performance Objectives	None	Level 1	Level 2	Level 3	Level 4	Level 5	Level 6
General Transportation Management	*						
Hazardous/Radioactive Materials Packaging		0	1	1	3	1	0
Hazardous/Radioactive Materials Shipper		0	0	5	0	0	4
Transportation Operations		0	0	1	1	0	1
Motor Carrier Operations		0	1	1	2	0	0
Railroad Operations	**						
Transportation Emergency Response		0	1	1	1	1	0
HAZMAT Employee Training		0	1	0	3	0	0

* No observations were noted in this section during any of the TCEAPs performed for FY-00

** No evaluations were performed for this area during FY-00

Level 1 through 3 Observations deal with regulatory compliance issues. A Level 1 Observation may indicate that a “stop-work” is in order. Level 2 Observations indicate that management systems are not in control of the process, and Level 3 Observations indicate that management systems are in control, but at least one violation of federal regulations, DOE Orders, or other applicable regulations has occurred. Level 4 and 5 Observations deal with Best Management Practices and issues of nonconformance with company policies and/or procedures. Level 6 Observations involve the formal recording of “recommendations.”

Overall improvements cannot be determined solely by the number of observations or recommendations made during TCEAP evaluation activities. Although specific observation and recommendation data are available, such data are too inconclusive to develop any trending. As TCEAP evaluations continue, trending of observations and recommendations made during TCEAP activities will become part of the quarterly reporting process as more data are gathered and analyzed.

5.0 LESSONS LEARNED

5.1 M&O/M&I Contractor Responsibilities

An issue was raised in FY 2000 that is similar to one addressed in the FY 1999 TCEAP evaluations—Management and Operations (M&O) versus M&I contractors. Each checklist is

based on applicable international, federal, state, Tribal, and local rules and regulations, as well as applicable DOE Orders. Without proper inclusion of transportation- and packaging-related DOE Orders in their contracts, contractors did not feel required to perform in a consistent manner across the DOE complex. This invited confusion and a general lack of performance on the part of contractors who did not have all applicable transportation- and packaging-related DOE Orders included in their contract mechanisms. It was discovered that 41 CFR, Chapter 109, Part 109-40, addressed the applicability of DOE Order 460.2 to cost-type contractors. This regulation states, "DOE-OMR 109-40, Transportation and Traffic Management, should be applied to cost-type contractors' transportation and traffic management activities. Departure by cost-type contractors from the provisions of these regulations may be authorized by the contracting officer provided the practices and procedures followed are consistent with the basic policy objectives in these regulations and DOE Order 460.2, Departmental Materials Transportation and Packaging Management, except to the extent such departure is prohibited by statute or executive order." This is interpreted to mean that M&I contractors must, at a minimum, comply with the requirements of 41 CFR, Part 109-40, or with practices and procedures that are consistent with DOE Order 460.2, even if the Order is not specifically listed in the M&I contract.

Recent developments with regard to GSA regulations promulgated in 41 CFR 101-40 have been moved from the Federal Property Management Regulations to the Federal Management Regulations and are not found in 41 CFR 102-117. This may have some impact to DOE regulations promulgated in 41 CFR 109-40. A review of this impact is being performed during FY-01 and will be reported in the next TCEAP Annual Report.

During various TCEAP evaluation activities for FY 2000, it was discovered that many contractors are choosing to use a third-party service to provide first responders with emergency response/mitigation information. Although the regulations allow such a relationship, they do not relieve the contractor from the "shipper" responsibilities identified in 49 CFR, Part 172.600. Specifically, §172.604(a)(2) states, "...the number of a person who is either knowledgeable of the hazardous material being shipped and has comprehensive emergency response and incident mitigation information for that material, or has immediate access to a person who possesses such knowledge and information." Due to the seriousness of a potential breakdown between the contractor (responsible party) and the third-party service provider, DOE Headquarters will issue a policy memo that provides guidance to DOE and its contractor transportation organizations on the proper use of third-party service providers and other requirements found in 172.600.

5.2 OA-30 Review Results

The Office of Independent Oversight and Performance Assurance (OA-30) performed a complete review of the TCEAP evaluation process during FY 2000. OA-30 was present during the West Valley Demonstration Project (WVDP) TCEAP evaluation and reviewed the TCEAP Management Plan, Standard Operating Procedures, and Checklists associated with the program. They also observed TCEAP evaluation team members in the conduct of their duties as they reviewed policies and procedures, interviewed personnel, and watched the performance of

various jobs in the field. OA-30 gave TCEAP its highest (Satisfactory) rating with no official findings.

5.3 Observations

For FY 2000, Observation Levels 1 and 2 are listed in this TCEAP Annual Report. No Level 1 Observations were noted for FY 2000. A description of each Level 2 Observation is provided below.

Hazardous and Radioactive Materials Packaging

Observation: The sample shipping process has neither a system in place to determine whether preserved samples are DOT-regulated, nor a quality assurance system to verify the inner sampling receptacles are pressure-tested for air shipments, when applicable.

No formal process at Rocky Flats was found to ensure that a DOT Hazard classification for preserved liquid samples was made prior to shipment. In addition, no quality assurance checks were in place to verify that the inner receptacles procured and utilized for liquid samples of limited quantity radioactive material samples and/or corrosive samples were pressure-tested to 95 kPa for air shipments.

Motor Carrier Operations

Observation: The Stanford Linear Accelerator Center (SLAC) was found to be operating as a motor carrier offsite in substantial noncompliance with applicable sections of the Federal Motor Carrier Safety Regulations (FMCSR). There appeared to be a lack of understanding of the Federal Motor Carrier requirements that govern these activities.

In reviewing the motor carrier operations at SLAC, it was determined that a lack of knowledge about the applicable regulations exists; therefore, the motor carrier operations, especially those conducted offsite, were determined to be noncompliant with those regulations.

Transportation Emergency Response

Observation: The level of coordination for Transportation Emergency Response between Traffic Management, Waste Management, Emergency Management, and Security was determined to be fragmented, and to be noncompliant with 49 CFR, Part 172.600. A lack of planning and coordination for emergency response was identified among the Duty Officer, the shipping organization, and the third-party emergency response 24-hour service provider. Procedures and responsibilities were not clearly understood by all groups.

It was apparent that data provided to CHEMTREC by Lawrence Berkeley National Laboratory (LBNL) was insufficient to meet the intent of 49 CFR, Part 172.604, when comprehensive

emergency response and mitigation information was requested. During the drills conducted, CHEMTREC had difficulty locating the shipping papers. There was considerable delay while CHEMTREC operators searched through a stack of papers not immediately accessible to them. The information provided to CHEMTREC also did not meet the requirements of 49 CFR, Part 172.604(a)(2).

HAZMAT Employee Training

Observation: LBNL had no system in place to identify HAZMAT employees or the status of their training. The recordkeeping for training was determined to be fragmented, and some groups were unable to locate their records.

As required by 49 CFR, Part 172.700, each HAZMAT employer is required to implement policies and procedures to identify HAZMAT employees and to ensure they are trained in accordance with the Hazardous Materials Regulations, including function-specific training. The employer is required to ensure that employees are tested and that such testing is formally documented. Employers are required to keep current training records that include the HAZMAT employee's name; their most recent training completion date; a description, copy, or location of the training materials used to meet the requirements of 49 CFR part 172.704(a); the name and address of the person who provided the training; and a certification that the HAZMAT employee has been trained and tested.

6.0 CONCLUSION

TCEAP evaluations are intended to improve the quality and performance of transportation and packaging operations activities throughout the DOE complex. The limited number of TCEAP evaluations performed during FY 2000 demonstrated that the DOE complex is experiencing difficulties in areas that should be showing improvement. A comparison of recent TCEAP evaluation results with previous evaluations demonstrated that areas needing improvement are shifting to other areas not previously identified. As TCEAP activities continue and corrective action plans are developed and implemented, general transportation and packaging activities will improve.

The TCEAP has demonstrated itself to be a valuable tool for improving the quality of DOE transportation and packaging activities. The requirements listed in DOE Order 460.2 should be reviewed to enhance utilization of the TCEAP to ensure its continued success in fostering continuous improvement.